

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CASE NO. 1:12-cv-2296-TCB

Securities and Exchange Commission,

Plaintiff,

vs.

Aubrey Lee Price, PFG, LLC, PFGBI,
LLC, Montgomery Asset Management,
LLC f/k/a PFG Asset Management,
Montgomery Asset Management, LLC
f/k/a PFG Asset Management,

Defendants.

Genworth Life Insurance Company,
Protective Life Insurance Company,
Household Life Insurance Company,

Plaintiffs in Intervention,

vs.

Melanie E. Damian, as Receiver for the
Estate of Aubrey Lee Price, PFG, LLC,
PFGBI, LLC, Montgomery Asset
Management, LLC f/k/a PFG Asset
Management, Montgomery Asset
Management, LLC f/k/a PFG Asset
Management,

Defendant in Intervention.

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**RECEIVER'S RESPONSE TO PROTECTIVE LIFE INSURANCE
COMPANY'S FIRST SET OF INTERROGATORIES, REQUESTS FOR
PRODUCTION, AND REQUESTS FOR ADMISSION**

Defendant in Intervention, Melanie E. Damian, as Receiver for the Estate of Aubrey Lee Price, PFG, LLC, PFGBI, LLC, Montgomery Asset Management, LLC f/k/a PFG Asset Management (Florida limited liability company), Montgomery Asset Management, LLC f/k/a PFG Asset Management (Georgia limited liability company) (the "Receiver"), pursuant to Rule 33, 34, and 36 of the Federal Rules of Civil Procedure, hereby files her response to Protective Life Insurance Company's First Set of Interrogatories, Requests for Production, and Requests for Admission dated June 5, 2014, and deemed served by agreement on June 7, 2014.

INTERROGATORIES

1. Identify all persons who assisted with the drafting of answers to these Interrogatories and describe each such person's role.

RESPONSE: The Receiver's special insurance counsel, Jason S. Mazer and Matthew L. Baldwin of the law firm of Ver Ploeg & Lumpkin, P.A., drafted these answers after consultation with the Receiver and her counsel, Kenneth D. Murena.

2. Identify all individuals with whom you communicated regarding whether or not Price was deceased following his disappearance on June 16, 2012.

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19. Produce copies of any insurance policy that potentially provides you with coverage for the claims set forth in Protective's Complaint.

RESPONSE: None.

REQUESTS FOR ADMISSION

1. Admit that the Policy was only payable upon Price's death.

RESPONSE: Admitted that the Policy "*was* only payable" only upon the death of Price, denied that payment of the Policy's death benefits is not presently enforceable despite the parties' subsequent discovery that Price is alive.

2. Admit that you currently have sufficient funds to return the Payment made by Protective.

RESPONSE: Admitted. *See* D.E. 202, Ex. A.

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Respectfully submitted,

VER PLOEG & LUMPKIN, P.A.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served *via* electronic mail this 6th day of August 2014 upon: all counsel of record identified on the attached Service List.



Jason S. Mazer

VERIFICATION

The undersigned swears under penalty of perjury that the foregoing Answers to Interrogatories are true and correct.



Melanie Damian

STATE OF FLORIDA)
)
COUNTY OF MIAMI DADE)

BEFORE ME, the undersigned authority, personally appeared Melanie Damian, who is personally known to me or has produced _____ as identification, and who, after being duly sworn, deposes and says that she executed the foregoing answers to Protective Life Insurance Company's First Set of Interrogatories to Defendant Melanie Damian and that they are true, correct, and complete to the best of her knowledge.

Sworn to and subscribed before me on this 14th day of August, 2014.



NOTARY PUBLIC, STATE OF Florida
MY COMMISSION EXPIRES: